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*Attorneys Specially Appearing for Defendants  
Philips Taiwan Limited and Philips do Brasil Ltda.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

	)	Case No. 07-5944-SC
In re: CATHODE RAY TUBE (CRT)	)	
ANTITRUST LITIGATION	)	MDL No. 1917
	)	
	)	<b>DECLARATION OF ERIK T. KOONS IN</b>
	)	<b>SUPPORT OF PHILIPS TAIWAN</b>
	)	<b>LIMITED'S AND PHILIPS DO BRASIL</b>
	)	<b>LTDA.'S ADMINISTRATIVE MOTION</b>
	)	<b>TO FILE DOCUMENTS UNDER SEAL</b>
	)	<b>PURSUANT TO CIVIL LOCAL RULES 7-</b>
	)	<b>11 AND 79-5(D)</b>
This Document Relates to:	)	

ALL INDIRECT PURCHASER ACTIONS

MDL 1917

DECLARATION OF ERIK T. KOONS IN SUPPORT OF PHILIPS TAIWAN LIMITED'S AND PHILIPS DO  
BRASIL LTDA.'S ADMINISTRATIVE MOTION TO FILE DOCUMENTS UNDER SEAL PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(D) (3:07-CV-05944 SC, MDL NO. 1917)

1 I, Erik T. Koons, hereby declare as follows:

2 1. I am a partner with the law firm of Baker Botts L.L.P., counsel for Defendants  
3 Koninklijke Philips N.V. (“KPNV”) and Philips Electronics North America Corporation  
4 (“PENAC”). I submit this declaration in support of Philips Taiwan Limited’s (“PTL”) and Philips  
5 do Brasil Ltda.’s (“PDBL”) Administrative Motion to File Documents Under Seal Pursuant to Civil  
6 Local Rules 7- 11 and 79-5(d).

7 2. I was admitted to appear *pro hac vice* in this case on behalf of Defendants KPNV and  
8 PENAC. *See* Dkt. Nos. 1517, 1519. I have not appeared on behalf of PTL or PDBL in this action,  
9 but am specially appearing to file these defendants’ motion to dismiss for insufficient service of  
10 process and lack of personal jurisdiction and the administrative motion to file documents under seal.

11 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No. 306) (the  
12 “Stipulated Protective Order”).

13 4. Pursuant to the Protective Order and Local Civil Rules 7-11 and 79-5(d), PTL and  
14 PDBL seek to file the following documents or portions thereof under seal:

- 15 • Portions of Philips Taiwan Limited’s and Philips do Brasil Ltda.’s Reply In Support  
16 of Their Motion To Dismiss For Insufficient Service Of Process and Lack of Personal  
17 Jurisdiction (“Reply”) and
- 18 • Exhibit A to the Second Declaration of Erik T. Koons in Support of Philips Taiwan  
19 Limited’s and Philips do Brasil Ltda.’s Motion To Dismiss For Insufficient Service of  
20 Process and Lack of Personal Jurisdiction.

21 5. The documents or portions of the documents submitted under seal contain either (a)  
22 material designated by other Defendants pursuant to the Stipulated Protective Order (Dkt. 306, June  
23 18, 2008) as “Confidential” or “Highly Confidential” or (b) analysis of, references to, or information  
24 taken directly from material designated by other Defendants pursuant to the Stipulated Protective  
25 Order as “Confidential” or “Highly Confidential.”

26 6. I declare under penalty of perjury under the laws of the United States of America that  
27 the foregoing is true and correct to the best of my knowledge.

Executed this 1st day of May, 2014, in Washington, D.C.

/s/ Erik T. Koons